

Math. Devlin

AO 91 (Rev. 08/09) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the  
Western District of TexasUnited States of America  
v.  
Jeromin ROMERO

Case No.

A-12-M-127

Filed

2/28/12

Clerk, U. S. District Court  
Western District of Texas

By

Deputy

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 27, 2012 in the county of Williamson in the  
Western District of Texas, the defendant(s) violated:

## Code Section

Title 8 USC 1324(a)(1)(A)(ii)

## Offense Description

Knowingly, conspire and agree with each other, and in reckless disregard of the fact that aliens have come to, entered, and remain in the United States in violation of federal law, transports, or moves, or attempts to transport or move such aliens to wit: Elias Guerra-Diaz and Belzazar Guerra-Diaz, within the United States by means of transportation.

This criminal complaint is based on these facts:

See Attachment

☒ Continued on the attached sheet.

J. B. H110

Complainant's signature

HSI SA Leo Buentello

Printed name and title

Sworn to before me and signed in my presence.

Date: 02/28/2012

Dennis J. Green

Judge's signature

City and state: Austin, Texas

United States Magistrate Dennis Green

Printed name and title

Attachment

On February 27, 2012, Round Rock Police Department Officer C. Wilson observed a black Mercury Cougar with paper license plates traveling northbound on Interstate Highway 35 in Round Rock, Texas. Officer Wilson conducted a traffic stop on the vehicle for having dark tint. Officer Wilson made contact with the driver Jeromin ROMERO. Officer Wilson asked ROMERO who the passengers were in his vehicle and ROMERO stated they were his cousin and his friend. ROMERO was giving them a ride from San Antonio to Dallas. Officer Wilson asked what the name of his cousin was and ROMERO was unable to give a timely response. ROMERO ultimately said his name was "Raul". ROMERO's two passengers did not speak English and did not respond to the name "Raul". An on scene interview of the front seat passenger later identified as, Elias Guerra-DIAZ and back seat passenger, Belzazar Guerra-Diaz Lucas revealed they were going to pay ROMERO to transport them from San Antonio, Texas to Dallas, Texas. Elias Guerra-DIAZ and Belzazar told the officers on scene they were illegal aliens from Mexico.

The Round Rock Police Department contacted Homeland Security Investigation (HSI) Special Agent Leo Buentello and advised him they had stopped a vehicle possibly transporting two undocumented illegal aliens. SA Leo Buentello responded to the scene and read ROMERO his Miranda Warning in English which was witnessed by HSI SA Deron Matteson. ROMERO waived his rights by signing the waiver of rights form and made the following statement to HSI SA Leo Buentello. ROMERO stated that he was going to get paid two hundred dollars to transport the illegal aliens from San Antonio to Dallas. ROMERO was going to receive payment once he dropped off the illegal aliens in Dallas. ROMERO stated that he knew both persons in his vehicle were illegal aliens. Furthermore, ROMERO stated he had successfully transported one illegal alien to Houston, Texas and was paid one hundred and fifty dollars.

SA Leo Buentello interviewed the two passengers identified as Elias Guerra-Diaz and Belzazar Guerra-Diaz. SA Leo Buentello determined that both subjects were undocumented illegal aliens from Mexico. Elias Guerra-Diaz stated that they were going to pay ROMERO two hundred dollars to be transported to Dallas, Texas.